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July 1, 2004

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PUBLIC SERVICE
COMMISSION

Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

RE: Southeast Telephone Company v. Kentucky ALLTEL, Inc., Case
No. 2004-00093

Dear Ms. O'Donnell:

Enclosed for filing in the above-referenced case are an original and four unredacted copies of Kentucky ALLTEL, Inc.'s Responses to the First Data Request of Commission Staff issued on June 22, 2004, and a Petition for Confidential Treatment. As Commission Staff had requested an original and four unredacted copies of the responses, same are being provided, although each of the copies is itself considered highly proprietary and confidential in its entirety and is not to be duplicated in any way. Please file-stamp the extra copy and return it to me in the self-addressed, pre-stamped envelope I have enclosed for your convenience.

Thank you for your cooperation in this matter. Please do not hesitate to contact me with any questions you may have.

Sincerely,

WYATT, TARRANT & COMBS, LLP

Noelle M. Holladay

Enclosures

cc: James T. Meister
James H. Newberry, Jr.
30323364.3

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COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:)
SOUTHEAST TELEPHONE COMPANY)
COMPLAINANT)
v.)
KENTUCKY ALLTEL, INC.)
DEFENDANT)

Docket No. 2004-00093

PETITION FOR CONFIDENTIAL TREATMENT

Kentucky ALLTEL, Inc. ("Kentucky ALLTEL") moves the Public Service Commission of Kentucky ("Commission") pursuant to K.R.S. §61.878(1)(c)(1) and 807 KAR 5:001, Section 7 to accord confidential treatment to Kentucky ALLTEL's Responses to the First Data Request of Commission Staff issued on June 22, 2004, and in support thereof states the following:

1. On June 22, 2004, Commission Staff issued data requests to Kentucky ALLTEL requesting detailed information regarding all local service requests ("LSRs") submitted by SouthEast Telephone to Kentucky ALLTEL.

2. The LSRs contain customer proprietary information, which is treated as highly confidential by Kentucky ALLTEL. The customer information and LSRs (collectively, "Confidential Information") has not been released publicly and is disclosed internally within Kentucky ALLTEL on a need-to-know basis only and to the Commission only when required and only pursuant to a confidentiality agreement or enforceable order according the Confidential Information confidential treatment. Kentucky ALLTEL employs all reasonable measures to protect the confidentiality of the Confidential Information and to guard against its inadvertent,

unauthorized disclosure. Further, Kentucky ALLTEL is not entitled to publish such Confidential Information on behalf of the customers.

4. K.R.S. §61.878(1)(c)(1) provides in pertinent part:

The following public records are excluded from the application of ...[the Open Records Act] and shall be subject to inspection only upon order of a court of competent jurisdiction ...

(c)1. ...records confidentially disclosed to an agency or required by an agency to disclosed to it, generally recognized as confidential or proprietary, which if openly disclosed would permit an unfair commercial advantage to competitors of the entity that disclosed the records.

5. Public disclosure of the information would provide other entities an unfair competitive advantage by affording them access to the customers' Confidential Information. Such Confidential Information is generally considered confidential and proprietary in the telecommunications industry.

6. The Confidential Information is also protected from disclosure pursuant to K.R.S. §61.878(1)(c)(2)(c) as confidential and proprietary records disclosed to the Commission in conjunction with the regulation of a commercial enterprise.

7. Filed with this Petition are an original and four copies of the Confidential Information in response to Staff's data requests. The information contained in the responses is confidential in its entirety and should be treated as such.

WHEREFORE, Kentucky ALLTEL respectfully requests that the LSRs containing the customer Confidential Information be accorded confidential treatment and be placed in the confidential files of the Commission and that Kentucky ALLTEL be accorded all other relief to which it may be entitled.

Dated: July 1, 2004.

Respectfully submitted,

KENTUCKY ALLTEL, INC.

By: Noelle M. Holladay
James H. Newberry, Jr.
Noelle M. Holladay
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Petition for Confidential Treatment were served on the following by first class mail, postage prepaid:

Jonathon N. Amlung, Esq.
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429 W. Muhammad Ali Blvd.
Louisville, KY 450202
502/584-0439

Deborah T. Eversole, Esq.
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40602
502/564-7279

This 1st day of July, 2004.

Phyllis E. Masters